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**VIA ELECTRONIC FILING**

Ms. Jocelyn Boyd  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
Synergy Business Park, Saluda Building  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

**Re: Application of CUC, Inc. for Adjustment of Rates and Charges  
Docket No. 2013-451-WS**

Dear Ms. Boyd:

As required by R. 103-833 of the Commission's Rules of Practice and Procedure, we are filing copies of Second Interrogatories and Requests for Documents that we served today on Applicant CUC, Inc. in the captioned proceeding.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

FRE/tch  
Enclosures

cc: Steven G. Mikell, Esquire (via email and US Mail)  
Shannon Bowyer Hudson, Esquire (via email and US Mail)  
Andrew M. Bateman, Esquire (via email and US Mail)  
Mr. Patrick W. Parkinson (via email)  
Mr. Thomas J. Noyes (via email)

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2013-451-WS**

<b>In Re:</b>	)	<b>SECOND INTERROGATORIES</b>
	)	<b>AND REQUESTS FOR</b>
<b>Application of CUC, Incorporated for</b>	)	<b>DOCUMENTS OF CALLAWASSIE</b>
<b>Adjustment of Rates and Charges</b>	)	<b>ISLAND PROPERTY OWNERS</b>
	)	<b>ASSOCIATION</b>

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TO: Steven G. Mikell, Esquire, attorney for CUC, Inc.:

Callawassie Island Property Owners Association ("CIPOA") hereby requests that CUC, Inc. ("CUC"), no later than twenty (20) days after service hereof, answer the following interrogatories and produce the following documents in accordance with South Carolina Public Service Commission Rule 103-833. These requests shall be deemed to continue until the time of the hearing of the case.

**Requests for Documents.**

1. Provide copies of financial statements, audited or unaudited, from 2005 thru 2013.
2. Provide a copy of any contract between CUC and either the original developers of Callawassie Island or the CIPOA.
3. Provide a copy of any contract between CUC and either the original developer of Spring Island or the Spring Island Property Owners Association.
4. Provide a copy of each CUC corporate income tax return for each year from 2005 through 2013.

**Interrogatories.**

1. Provide the average number of hours per week worked by each employee of CUC.
2. Provide the names of all employees who participate in the CUC 401k plan.

3. Provide calculations showing any savings attributable to bi-monthly billings and indicate where those savings are shown in the CUC test year.
4. Provide a list of upgrades and improvements to the CUC system since 2005 with investment costs.
5. Provide a complete list of vehicles and explanation of use of such vehicles.
6. Provide detail for the current liabilities of \$741,800 shown on the CUC balance sheet.
7. Provide actual salary costs for each year from 2005 through 2014.
8. Provide actual employee benefit costs for each year from 2005 through 2014.
9. Provide the address of office rented by CUC.
10. Provide tonnage and cost for sludge removal for each year from 2005 through 2013.
11. Provide volume by year of water, irrigation water, sewerage treated and supplied from 2005 through 2013.
12. Provide a list of depreciation rates used for 2013.
13. Provide a list of any directors of CUC and any compensation provided by CUC to those directors from 2005 through 2014.

Dated this 15<sup>th</sup> day of August, 2014.

ROBINSON, MCFADDEN & MOORE, P.C.



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Owners Association

Toni C. Hawkins